

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE
ANDRE BISASOR, Plaintiff,
v. CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON &
HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**ADDENDUM TO
EMERGENCY MOTION OF URGENT CLARIFICATION AND REQUEST FOR
CORRECTION**

1. I ask the court to allow the entire motion for reasonable accommodations to remain sealed at Level II based on the points raised in this motion and based on the fact that the rest of the motion containing my medical information takes up essentially the remainder of the motion. This eliminates the need for me to have to act or respond, or provide any redacted document.
2. If the court makes the correction accounting for its misunderstanding regarding my having shared medical information with the defendants (which is not the case), then the grounds or sealing the entire motion at level II remains intact, as I requested in my motion to seal.
3. If the court still wants me to redact information and refile the redacted copy of motion with all medical information redacted including for myself, then I need more time. I will not be available to meet the short deadline of Monday 4-29-24. The order came out today and so this gives me 2 business days. I have explained in the 4-23-24 hearing why I will be hampered until 5-13-24.
4. If the court is going to issue an order that I may need to response to or object to, then I need until 5-13-24 to respond, as explained in the 4-23-34 hearing. NB: The court assured me that there is nothing else that I would need to do other than file a reply to the objection to the motion to amend complaint and the objection to the order on remand and remand discovery.
5. Please grant my request or grant any other relief the Court deems proper.

Respectfully submitted,
/s/ Andre Bisasor
Andre Bisasor

April 25, 2024

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor
Andre Bisasor